IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
In re:	Chapter 1

AMYRIS, INC., et al.,

Debtors.¹

Case No. 23-11131 (TMH)

(Jointly Administered)

Re Docket No. 394

CERTIFICATION OF COUNSEL REGARDING DEBTORS' THIRD OMNIBUS MOTION FOR THE ENTRY OF AN ORDER (A) AUTHORIZING REJECTION OF EXECUTORY CONTRACTS EFFECTIVE AS OF THE APPLICABLE REJECTION DATE; AND (B) GRANTING RELATED RELIEF

The undersigned hereby certifies that:

On September 27, 2023, the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") filed the *Third Omnibus Motion for the Entry of an Order (A)*Authorizing Rejection of Executory Contracts Effective as of the Applicable Rejection Date; and

(B) Granting Related Relief [Docket No. 394] (the "Motion").

Pursuant to the *Notice of Third Omnibus Motion for the Entry of an Order (A) Authorizing Rejection of Executory Contracts Effective as of the Applicable Rejection Date; and (B) Granting Related Relief* [Docket No. 394-2], objections to entry of an order granting the Motion were due no later than October 11, 2023, at 4:00 p.m. Eastern Time (the "Objection Deadline").

The Debtors received informal responses from Official Committee of Unsecured Creditors (the "<u>Committee</u>"). No party filed an answer, objection, or other responsive pleading to the Motion on the Court's docket.

A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors' claims and noticing agent at https://cases.stretto.com/Amyris. The location of Debtor Amyris Inc. principal place of business and the Debtors' service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

Attached hereto as **Exhibit A** is a revised proposed form of order approving the Motion which incorporates the comments of the Committee (the "<u>Proposed Order</u>").

A blacklined copy of the Proposed Order is attached hereto as **Exhibit B**, showing changes from the Order submitted with the Motion.

Accordingly, the Debtors request that the Proposed Order attached hereto as **Exhibit A** be entered at the Court's earliest convenience.

Dated: October 12, 2023 PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Richard M. Pachulski (admitted *pro hac vice*)
Debra I. Grassgreen (admitted *pro hac vice*)
James E. O'Neill (DE Bar No. 4042)
Jason H. Rosell (admitted *pro hac vice*)
Steven W. Golden (DE Bar No. 6807)
919 N. Market Street, 17th Floor
P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100 Facsimile: (302) 652-4400

Email: rpachulski@pszjlaw.com dgrassgreen@pszjlaw.com joneill@pszjlaw.com jrosell@pszjlaw.com sgolden@pszjlaw.com

Counsel to the Debtors and Debtors in Possession